

POLICY

Document Title	Freedom of Information Policy
Version	Version 1.0
Equality Impact Assessment Status	Complete
Approved by	Board of the Corporation
Date approved	27th February 2024
Effective date	28th February 2024
Date of next review	November 2026
Lead responsibility	Director of IT and Information Services

1. Overview

- 1.1. The Freedom of Information Act 2000 (FoIA) promotes greater openness across the public sector by giving the public a right of access to all recorded information held by colleges and other public authorities.
- 1.2. The College is committed to transparency in its dealings with the public and fully embraces the aims of the FoIA. The College will make every effort to meet its obligations, subject to any exemptions that apply, under the respective legislation, and will regularly review procedures to ensure that it is doing so.
- 1.3. The College has implemented this Policy to ensure all College employees are aware of what they must do if they receive a freedom of information request. This will maintain confidence in the College and will provide for successful working and learning environments for all.
- 1.4. Adopting a publication scheme is a requirement of Section 19 of the FoIA, and the College has adopted the model publication scheme produced by the Information Commissioner's Office (ICO) for further education colleges 2009. The model publication scheme can be found on the ICO website at:
<https://ico.org.uk/media/for-organisations/documents/1153/model-publication-scheme.pdf>
- 1.5. The FoIA can be found at: <https://www.legislation.gov.uk/ukpga/2000/36/contents>

2. About this Policy

- 2.1. This Policy (and the other policies and documents referred to in it) sets out the basis on which the College will fulfill its obligations laid out in the FoIA in accordance with the provisions laid out therein.
- 2.2. It applies to all recorded information held by the College or by any external partner on behalf of the College that relates to the business of the College, whether this is stored electronically, in paper form, or otherwise.
- 2.3. As well as adhering to the FoIA, this policy will also consider the United Kingdom Data Protection Laws, and the Environmental Information Regulations 2004 (EIR).
- 2.4. This policy will identify how anyone can make a request for information to the College under the FoIA and the EIR.
- 2.5. If you have any queries concerning this Policy, please contact the College Information Services Compliance Lead who is responsible for ensuring the College's compliance with this Policy.

3. Definitions

- 3.1. *The College* – Derwentside College
- 3.2. *The Freedom of Information Act 2000 (FoIA)* – A piece of legislation that grants public access to documents or other data in the possession of a government agency or public authority, unless the information falls into a category that is specifically excluded from the terms of the legislation.
- 3.3. *Data Protection Laws* – The General Data Protection Regulation (Regulation (EU) 2016/679) and all applicable laws relating to the collection and use of Personal Data and privacy and any applicable codes of practice issued by a regulator including in the UK, the Data Protection Act 2018.
- 3.4. *The Environmental Information Regulations 2004 (EIR)* – A UK law that provides public access to environmental information held by public authorities.
- 3.5. *Information Services Compliance Lead* – Our Information Services Compliance Lead is Marie Richardson, who can be contacted at: 01207 585900, enquiries@derwentside.ac.uk.
- 3.6. *The Information Commissioner's Office* – The UK's data protection regulator.

- 3.7. *Publication scheme* – The document describing the classes or categories of information the College publishes or intends to publish, how the information can be accessed and whether charges apply.
- 3.8. *Dataset* – Information comprising a collection of information held in electronic form where all or most of the information has been obtained for the purpose of providing the College with the provision of a service by the College, is factual, and is presented in a way that has not been organized, adapted, or otherwise materially altered since it was obtained or recorded.
- 3.9. *Public Interest Test* – A process to enable the College to make decisions on a case-by-case basis on where the balance between disclosing or withholding information lies.
- 3.10. *Legal Professional Privilege* – An individual's ability to speak freely and frankly with their legal adviser to obtain appropriate legal advice.

4. Responsibilities

- 4.1. The Board of the Corporation is responsible for:
- Approving the Freedom of Information Policy and ensuring the College is compliant with all aspects of it.
 - Reviewing freedom of information requests and monitoring compliance with the Freedom of Information Policy.
- 4.2. The Principal and Chief Executive is responsible for:
- Ensuring there is clear direction and visible management support for all freedom of information issues.
 - Promoting compliance with the FoIA through appropriate commitment and adequate resourcing.
- 4.3. The Director of IT and Information Services is responsible for:
- Supporting the Information Services Compliance Lead to ensure that all College staff have awareness of this policy and related guidance notes.
 - Providing guidance for the establishment of standards, procedures, and facilities to ensure that this policy is adhered to.
 - Supporting the Information Services Compliance Lead in their responsibilities laid out in this policy.
 - Drafting this policy and ensuring that it is reviewed in accordance with the College review schedules.
- 4.4. The Information Services Compliance Lead is responsible for:
- Ensuring that all College staff have awareness of this policy and related guidance notes.
 - Receiving and logging any freedom of information requests.
 - Ensuring that the initiator of the freedom of information request has followed the correct guidelines laid out in this policy.
 - Deciding whether the freedom of information request is clear and that there are no queries relating to the request; contacting the requester for clarification if required.
 - Identifying whether the requested information is readily available and signposting the initiator to that information if that is the case; identifying the source of the information if it is not readily available and collecting the required information from that source if the College holds the requested information.
 - Identifying any costs that may be incurred in collecting the information and ensuring the Finance Team collects this cost before processing the request.
 - Liaising with the Director of IT and Information Services to decide whether the College is able or inclined to provide the information and refusing the request if not.
 - Converting the information to the required format and making this available to the requester, if the

request is approved, either by post, email, via a secure link, or face to face, within the required timeframe.

4.5. Line managers are responsible for:

- Ensuring that this policy and guidance notes are correctly implemented within their business area, and ensuring their staff comply with this policy.
- Notifying the DPO of any Freedom of Information requests made to them or to their staff.
- Ensuring all information correspondence, notes, summaries of verbal conversations etc. are sent to the Information Services Compliance Lead for central collation of the Freedom of Information request.

4.6. All College Employees are responsible for:

- Complying with this policy and following the guidance notes associated with this policy.

5. The College Publication Scheme

5.1. The publication scheme commits the College to make information available to the public as part of our normal business activities and to:

- Specify, and proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the College and falls within the classifications of the publication scheme.
- Produce and publish the methods by which specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and regularly update the information the College makes available under the publication scheme.
- Produce a schedule of fees charged for access to information made proactively available.
- Make the publication scheme available to the public.
- Publish any dataset that has been requested, and any updated versions held by the College, in an electronic form that is capable of re-use unless we are satisfied that it is not appropriate or practical to do so.

5.2. The information covered is included in the classes of information mentioned below, where this information is held by the College. The classes of information held in the publication scheme are:

- Who we are and what we do – Organisational information, locations and contacts, constitutional and legal governance.
- What we spend and how we spend it – Financial information relating to projected and actual income and expenditure, tendering, procurement, and contracts.
- What our priorities are and how we are doing – Strategy and performance information, plans, assessments, inspections, and reviews.
- How we make decisions – Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.
- Our policies and procedures – Current written protocols for delivering our functions and responsibilities,
- Lists and registers – Information held in registers required by law, and other lists and registers relating to the College's functions.
- The services we offer – Advice and guidance, booklets and leaflets, transactions, and media releases. A description of the services we offer.

6. Accessing information

6.1. The College will indicate clearly in the publication scheme what information is covered by the scheme and

how it can be obtained.

- 6.2. The College will make available information it holds whether it is listed in the publication scheme or not unless it is:
- Information the disclosure of which is prevented by law, or exempt under the FoIA, or is otherwise considered to be protected from disclosure.
 - Information in draft form.
 - Information that is no longer readily available as it is contained in files that have been placed in storage or is difficult to access for similar reasons.
 - Information that is impractical or resource-intensive to prepare for routine release.
- 6.3. Where it is within the College's capability, information will be available on the website. Where it is impracticable to do this or when the requester does not wish to access the information via the College website, the College will indicate how information can be obtained by other means and provide it by those means.
- 6.4. In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.
- 6.5. Information will be provided in the language it is held in or in any other language legally required. Where the College is legally required to translate any information, we will do so.
- 6.6. Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with the publication scheme.
- 6.7. Information held by the College that is not available on the College website should be requested in writing, when its provision will be considered in accordance with the provisions of the FoIA. The requested information will normally be made within 20 working days.

7. Requesting information

- 7.1. All requests for information should be clearly marked "Freedom of Information Access Request" to ensure immediate attention. The Freedom of Information Access Request Form, available on the College website, should normally be completed when making a Freedom of Information Access Request.
- 7.2. Written requests should be sent to:
- Freedom of Information Access Request
Information Services Compliance Lead
Derwentside College
Front Street
Consett
DH8 5EE
01207 585900
- enquiries@derwentside.ac.uk
- 7.3. In the case of requests by telephone or in person, a member of the College staff will help to complete the Freedom of Information Access Request Form. The requester may be sent a copy of the form and asked to confirm the details by signing and returning it to the postal or email address shown above. This is to ensure the College has fully understood the request and to allow the College to monitor response times.
- 7.4. When dealing with a request containing personal data, the College will consider the request under the appropriate FoIA section of Data Protection Laws.

8. Charges that may be made

- 8.1. The College is committed to making the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the College for routinely published material will be justified and transparent and kept to a minimum.
- 8.2. Information routinely available as part of the College publication scheme will be provided free of charge.
- 8.3. Charges may be made for information subject to a charging regime specified by Parliament and may be made for actual disbursements incurred, such as:
 - Photocopying.
 - Postage and packaging.
 - The costs directly incurred because of viewing information.
- 8.4. Charges may also be made for making datasets, or parts of datasets, that are relevant copyright works available for re-use. These charges will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where they apply, or with regulations made under section 11B of the FoIA, or with other statutory powers of the public authority.
- 8.5. If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment must be received prior to provision of the information.
- 8.6. In certain circumstances the College may waive the fee at its absolute discretion.

9. Refusing a request for information

- 9.1. Where the College does not hold the information requested, and the requester is made aware of this, it is the provision of a negative response and not a refusal of a request. If the College is transferring the request to another public body, the College must inform the requester in writing as soon as possible.
- 9.2. Where the College has previously complied with a request for information, it is under no obligation to answer a subsequent, similar request from that person unless the following has occurred:
 - A reasonable interval has elapsed between the two requests.
 - The requester is different. If the requester is part of a group seeking to make vexatious requests, the College is entitled to refuse.
 - The information previously disclosed has changed in the intervening period.
- 9.3. The College has no obligation to respond to a request that is vexatious. A request that is clearly vexatious may contain abusive, offensive, or derogatory language regarding the College or its staff. Some requests may have an undertone that is less obvious, and the College can consider the criteria for vexatiousness if it is likely to cause a disproportionate or unjustified level of disruption, irritation, or distress. The College considers the following to be examples of a vexatious request:
 - The request is designed to cause disruption or annoyance.
 - The request is designed to cause an undue administrative burden on the College.
 - The request harasses the College.
 - The request can otherwise fairly be characterized as obsessive or manifestly unreasonable.
- 9.4. The College reserves the right to refuse a request where the total administrative cost to issue the response is greater than £450.

10. Exemptions to requests

- 10.1. While the public can submit Freedom of Information requests, the College may withhold information. The College must, when using exemptions, notify in writing to the requester the relevant exemption of the FoIA they have identified.
- 10.2. For limited exemptions, the College must confirm or deny in writing that they have the information requested, but do not have to disclose the actual information. Examples include:
- The College holds the information, and it is accessible by another route, e.g., the College Publication Scheme.
 - The information exists but it cannot be revealed as it is a trade secret or if the information would prejudice the commercial interests of the College.
- 10.3. Absolute exemptions refer to requests for information where the College does not have to confirm or deny that it holds the information, or to disclose the information to the requester. If this exemption is applied, no further assessment is necessary and there is no requirement for a Public Interest Test (PIT). For further information see section 10.5.
- 10.4. Some information requests can be subject to a qualified exemption. A PIT must be conducted to decide on the balance between the public interest in maintaining the exemption or disclosure of the information. Examples include:
- Information intended for future publication where it is reasonable that information should not be disclosed until the intended publication date.
 - Investigations and proceedings conducted by the College where:
 - There are investigations into whether a person should be charged with an offence.
 - There are investigations into whether a person charged with an offence is guilty.
 - There are investigations that may lead the College to initiate criminal proceedings.
 - Details of the criminal proceedings.
 - Law enforcement reasons where:
 - Information includes the prevention and detection of crime.
 - Ascertaining the causes of an accident.
 - Securing the health, safety, or welfare of persons at work.
 - Where disclosure would be likely to endanger the physical or mental health, or safety of an individual.
 - Environmental information must be requested via EIR legislation.
 - If Legal Professional Privilege (LPP) applies there will need to be a very strong public interest in favour of disclosure.
 - Where the release of information would prejudice the commercial interests of the College or other person or organization.
- 10.5. When considering qualified exemptions, the College must perform a PIT to assess whether the public interest in not disclosing the information request is greater than the public interest in disclosing the information. The College may extend the timeframe for response to conduct a PIT. The factors to consider are:
- When considering withholding information, the College must consider whether disclosure would:
 - Be subject to exemption.
 - Be prejudicial or have a detrimental impact on the College.
 - Negatively affect the rights of the College staff.
 - Negatively affect the wider population.
 - When considering disclosing information, the College must consider whether disclosure would:
 - Further the public understanding of the College and its functions.
 - Promote accountability.
 - Provide a forum for debate about key policy and decisions.
 - Promote transparency about decisions.
 - Make the College more accountable in its use of public money.
 - Allow public access to reasons behind decisions affecting lives.

11. Other factors to consider.

11.1. The College must be aware that before the release of information the following guidelines may be applicable:

- Some information within a document or dataset may not be relevant to a request. It is appropriate to remove or redact this section. If there is no sensitivity surrounding the whole document, then the College should consider releasing it in its entirety.
- If a section of the document is exempt, then the relevant section can be edited. The College must ensure the safety of edited documents so these must be saved as adobe pdf files or scanned and saved as an image.
- The College must ensure that blanked out sections in hard copy documents cannot be seen once photocopied.

11.2. Before disclosure, the College must ensure that:

- The response is in written format as the release of information verbally is not permitted.
- The College has considered the implications of any disclosure and the impact of future business relationships inside and outside the College if the information requested involves more than one area of the College or if the information is provided by a third party.
- Responses are written in a professional manner and pitched at a level normally used to inform the most senior members of staff at the College.
- Where the information due to be withheld or disclosed is novel, contentious, or newsworthy, the Principal of the College is briefed several days in advance of the release.

12. Appeals from requesters.

12.1. If an individual is not satisfied with how the College has managed their request, or the exemptions applied to the response, they have the right to ask for an internal review of the outcome of their request.

12.2. Appeals should be submitted to the Information Services Compliance Lead at the address provided in section 7 within 40 working days of receipt of the response. The appeal request should clearly state the reason for the appeal.

12.3. The College has an internal review policy for handling Freedom of Information requests which is:

- Any requests for a review of the College's decisions made under the FoIA should be forwarded, in the first instance, to the Information Services Compliance Lead.
- If the Information Services Compliance Lead was involved in any part of the College's decision about the original information request, the appeal request will be forwarded to the Director of IT and Information Services.
- The Director of IT and Information Services will examine the initial Freedom of Information request alongside the College response and decide on the appeal request.
- The College will write to the applicant with its findings within 20 working days of receipt of the request.

12.4. If the requester remains unhappy with the outcome of the appeal process, they are entitled to make a complaint to the ICO. The ICO is responsible for promoting best practice and ensuring that organisations comply with the FoIA. The ICO can be contacted at:

Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire

13. Guidelines for College Staff

- 13.1. A request for information may come to any part of the College from anywhere in the world. The request must be made in a recorded format e.g., email, letter, written, telephone message, face-to-face. The requester must give a name and a return address, either postal or email, before the request can be dealt with.
- 13.2. The requester is not required to tell College staff why they want the information.
- 13.3. If you receive a request for information that mentions Freedom of Information or is not information that would routinely provide in the course of your work, a request you are unsure of, or that is unusual, this should be considered a Freedom of Information request and the request should be sent to the address indicated in the Requesting Information section of this policy using the Freedom of Information Access Request Form, available on the College website.
- 13.4. The FoIA gives a general right of public access to all types of recorded information held by the College. This may include recordings of telephone conversations, notes, datasets, and information held by a third-party organization on behalf of the College. This also includes the right to be told whether the information exists.
- 13.5. The release of information may be subject to exemptions. Please see section 10 for further information.
- 13.6. The FoIA only applies to information that already exists. The College is not obliged to create information in response to an information request.
- 13.7. When College staff receive a Freedom of Information request, they must immediately advise their line manager who will then engage with the Information Services Compliance Lead who will oversee the management of the request and the associated response in line with the FoIA.
- 13.8. Any written request received by the College must be answered within 20 working days, starting from the date the request was received by the College. It is therefore important that the Information Services Compliance Lead is notified of any Freedom of Information requests as soon as possible as the 20 days' timeframe commences upon receipt by the College and not the Information Services Compliance Lead.
- 13.9. All requests must be processed on equal merit. The College will not allow any opinion or prior history of a person to cloud any response to a request.
- 13.10. The response must, where practicable, be provided in the format requested by the applicant e.g., hardcopy, email etc.
- 13.11. A person can request to inspect the actual records; in this case an appointment should be made with the Line Manager who has responsibility for the information requested. This must take place within 20 working days of the request being received by the College.
- 13.12. When the request has been completed Line Managers are responsible for ensuring that all information, correspondence, notes, summaries of verbal conversations etc. are scanned and sent to the Data Protection Officer for central collation as evidence of the College's decision.
- 13.13. A valid request must describe the information being sought. If the scope of the request is unclear, the College must ask for clarification to gain a better understanding of what is being asked for. Once clarification is requested, the College is not obliged to comply with the request until such clarification is received.
- 13.14. The time elapsed whilst clarification is sought shall not be included as part of the 20 working days response timeframe. The clock is paused until clarification is received.

14. Relevant Legislation / Regulation

14.1. The following legislation and regulations apply to this policy / procedure:

- Freedom of Information Act 2000.
- General Data Protection Regulation (GDPR) 2018.
- Data Protection Act 2018.
- The Environmental Information Regulations

15. Equality Impact Analysis

15.1. To ensure its compliance with The Equality Duty of the Equality Act 2010, the College will consider the impact of its decisions, practices, activities and services on employees, learners, and service-users with different protected characteristics.

15.2. The impact analysis process seeks to ensure that:

- College decisions, practices, activities, and services do not inadvertently disadvantage employees, learners, or service-users.
- opportunities to foster good relations between people from a variety of backgrounds are identified.

15.3. The impact of new policies and procedures will be analysed during their development while existing policies and procedures will be assessed at the time of their review.

15.4. The impact analysis is in two parts:

- initial screening to determine whether the policy or procedure has, or has the potential, for a high level of negative impact.
- full analysis where initial screening indicates that the policy or procedure has the potential for a high level, significant and extensive negative impact and/or may breach anti-discriminatory legislation.

15.5. Where appropriate, the College will seek to involve individuals with relevant experience, knowledge and understanding in the impact analysis.

15.6. Information gathered in the monitoring process will be used in the impact analysis.

15.7. Priorities for action arising from the impact analysis will be established through the Equality, Diversity, and Inclusion Committee.

16. Review

16.1. This document will be reviewed by the end of November 2026.

16.2. The Director of Information Services will review this, considering the outcomes of the monitoring process, legislative changes and developments in good practice.

16.3. As part of the review, the Director of Information Services will seek and consider the views of the College's employees and the Board of the Corporation.

16.4. The outcome of the review will be reported to the Executive Team and the Board of the Corporation as part of the ongoing review of the Policy.

17. Document Identification

Category [select ONE only]	<input type="checkbox"/> Programmes/courses <input type="checkbox"/> Partnerships <input type="checkbox"/> Finance <input type="checkbox"/> Quality <input checked="" type="checkbox"/> Governance <input type="checkbox"/> Health and safety <input type="checkbox"/> Facilities <input type="checkbox"/> Computer Services <input type="checkbox"/> MIS <input type="checkbox"/> Admissions <input type="checkbox"/> Teaching and learning <input type="checkbox"/> Personnel
Audience [select ALL that apply]	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Learners <input checked="" type="checkbox"/> Partners <input checked="" type="checkbox"/> Suppliers

EQUALITY IMPACT ASSESSMENT

This form must be completed when drafting a new policy/procedure or amending an existing policy/procedure. It should be completed at the earliest opportunity so any issues can be resolved/mitigated in advance.

POLICY / PROCEDURE DETAILS	
Name of policy / procedure:	Freedom of Information Policy
Version:	Version 2.0
Date of latest version:	16 November 2023
Manager responsible:	Gary Mills – Director of IT and Information Services
Others involved in this EIA:	

ASSESSMENT			
<p><i>What evidence have you used?</i> (This could be internal data, surveys, complaints/grievances or other external quantitative or qualitative research)</p>	<p>The policy outlines that the College is committed to adhering to Freedom of Information Act regulations and promoting greater openness across the public sector. The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires public bodies to have due regard to the need to:</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010; • Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and • Foster good relations between people who share a relevant protected characteristic and people who do not share it. <p>The College Freedom of Information policy does not impose any additional limitations on the public's rights and applies to all the public irrespective of age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.</p> <p>There is reason to believe that strengthening the College Freedom of Information practices will promote equality. For example, the public will benefit from strengthened confidence in respect of their rights to access information held by the College that could affect them.</p>		
<p>Who have you engaged / consulted with?</p> <p>(This could be individuals, groups, networks or organisations)</p>	<p>The content of the policy is a requirement of Freedom of Information law and as such is not subject to College discretion.</p>		
For each protected characteristic, does the evidence show that the policy/procedure...	does not inadvertently disadvantage or discriminate against staff, learners or service users?	actively explores opportunity and fosters good relations between people of different protected groups and backgrounds?	Where 'no' is checked, or concerns have been identified detail them here:
Age (including older and younger people)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Disability (including those with physical disabilities, unseen disabilities and mental health issues)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Sex (both men and women)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Gender reassignment or Gender identity (including trans staff and students who have transitioned, are considering transitioning or are in the process of transitioning from one gender to another, and also non-binary staff and students who do not identify with, or reject gender labels)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Marriage and Civil Partnership	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Pregnancy / Maternity (including breastfeeding mothers)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Race and Ethnicity (including nationality, colour, native language, culture and geographic origin)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Religion and belief (including those with no religion or belief)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Sexual orientation (including, but not limited to, gay, lesbian, bisexual, queer and straight staff and learners)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Intersectionality (although not a protected characteristic itself it's important to consider how characteristics intersect)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	


ACTION PLANNING		
Issue Identified	Planned or completed remedial action	Person responsible and timeframe

MONITORING AND REVIEW

How will the impact of your policy and procedure be monitored and reviewed once agreed?

The Director of IT and Information Services will maintain the Freedom of Information policy, ensuring it is legally compliant and report to the Senior Leadership Team yearly to provide assurance that the College is compliant with all aspects of the Freedom of Information Policy and relevant laws and legislation.

AUTHORISATION

Signature		Date
Manager responsible:		16/11/2023
EIA Panel:		
EIA Committee's Comments if applicable:		